

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

Brandy Edwards, ) Civil Action No. 9:18-cv-1170-RMG  
 )  
 Plaintiff, ) (Jasper County C/A No. 2018-CP-27-00197)  
 )  
 v. )  
 ) DEFENDANT'S NOTICE OF REMOVAL  
 Carolyn Bauman and Trusted )  
 Systems, Inc., )  
 )  
 Defendants. )  
 )

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A. Introduction

1. The Plaintiff is Brandy Edwards; the Defendants are Carolyn Bauman and Trusted Systems, Inc.

2. On April 10, 2018, Plaintiff sued Defendants for injuries arising out of a motor vehicle accident that occurred on July 29, 2017 in Jasper County, South Carolina. Plaintiff filed her Complaint in the Jasper County Court of Common Pleas.

3. Defendants were served with the Summons and Complaint on April 16, 2018. Defendant filed this Notice of Removal within the 30-day time period required by 28 U.S.C. §1446(b).

B. Basis for Removal

4. Removal is proper because there is complete diversity between the parties and the amount in controversy exceeds \$75,000.00, excluding interest, costs and attorneys' fees.<sup>1</sup> 28 U.S.C. §1332(a); *Darden v. Ford Consumer Fin. Co.*, 200 F.3d 753, 755 (11<sup>th</sup> Cir. 2000); *Laughlin v. Kmart Corp.*, 50 F.3d 871, 873 (10<sup>th</sup> Cir. 1995).

According to her Complaint, Plaintiff is a citizen of the State of South Carolina.<sup>2</sup> Defendant Bauman is a citizen of the State of Maryland. Defendant Trusted Systems, Inc., is an Arizona corporation with its principle place of business in Maryland.

5. All pleadings, process, orders, and other filings in the state court action are attached to this notice as required by 28 U.S.C. §1446(a).

6. Venue is proper in this district under 28 U.S.C. §1441(a) because this district and division embrace the place where the removed action has been pending.

7. Defendants will promptly file a copy of this Notice of Removal with the Clerk of State Court where the action has been pending.

C. Jury Demand

8. Plaintiff demanded a jury in the State Court action.

D. Conclusion

9. There is complete diversity of citizenship between the Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00, exclusive of interest, costs and attorneys' fees. Defendants filed this Notice of Removal within the 30-day time period required by 28 U.S.C. §1446(b).

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<sup>1</sup> By letter dated April 23, 2018, Plaintiff's counsel indicated that Plaintiff would not consent to any limitation on damages.

<sup>2</sup> At the time of the subject accident, Plaintiff had a driver's license issued by the State of Georgia.

Respectfully submitted,

s/ Steven J. Pugh

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Steven J. Pugh (Fed. ID #7033)  
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ATTORNEYS FOR DEFENDANTS

April 27, 2018

**CERTIFICATE OF SERVICE**

I do hereby certify that I served the foregoing **NOTICE OF REMOVAL** on the undersigned counsel by causing a copy of same to be e-mailed and mailed by United States Mail, Postage Prepaid, First Class, addressed as follows

J. Taylor Powell, Esquire  
Ellis R. Lesemann, Esquire  
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s/ Steven J. Pugh  
Steven J. Pugh

April 27, 2018